

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION
Case No. 1:16 CV-125

DANTE A. MURPHY,

Plaintiff,

vs.

CLEVELAND COUNTY
DEPARTMENT OF SOCIAL
SERVICES ET. AL. ,

Defendants.

**CONSENT MOTION FOR
PROTECTIVE ORDER FOR
CLEVELAND COUNTY
DEPARTMENT OF SOCIAL
SERVICES RECORDS, COUNTY
PERSONNEL FILES, AND
MEDICAL INFORMATION**

The Parties hereby move for entry of an Order authorizing disclosure of Cleveland County Department of Social Services records, county personnel files, and medical information, pursuant to N.C.G.S. §§ 7B-2901, 153A-98(c) and the inherent powers of this Court. In support of this Motion, the Parties state the following:

1. This case stems from the Defendants' alleged wrongful failure to promote the Plaintiff.
2. The Parties are prepared to produce relevant Cleveland County Department of Social Service records, county personnel files, and personal medical and health information in discovery.

3. Such records can only be produced pursuant to an order of the Court.
4. The Parties have submitted a consent protective order in order to comply with these statutes, leaving ultimate disposition of the documents subject to a final order of the Court.

WHEREFORE, the Parties respectfully move for entry of the proposed Consent Order submitted herewith.

This the 11th day of October, 2016

s/Julie Fosbinder
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Attorney for Plaintiff

s/Sean F. Perrin
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Attorney for Defendants

CERTIFICATE OF SERVICE

I certify that I have this day filed the **CONSENT MOTION FOR PROTECTIVE ORDER FOR CLEVELAND COUNTY DEPARTMENT OF SOCIAL SERVICES RECORDS, COUNTY PERSONNEL FILES, AND MEDICAL INFORMATION** by CM/ ECF which will send a copy to:

Julie Fosbinder
JHanfos2@aol.com

This 11th day of October, 2016.

s/Sean F. Perrin